



CALIFORNIA FARM BUREAU FEDERATION

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February 5, 2010

VIA EMAIL

Mr. Gregory Collord
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on Proposed Environmental Analysis Workplan for the
Renewable Electricity Standard

Dear Mr. Collord:

The California Farm Bureau Federation ("Farm Bureau") provides below preliminary comments on the draft Proposed Environmental Analysis Workplan released in December. The comments are directed at recommendations for appropriate information to be included in conducting further analysis related to the required environmental components.

The draft analysis provides that the CEQA equivalent analysis will evaluate, among other things, land impacts from new renewable generation facilities and transmission facilities. As has become increasingly clear in the recent past, agricultural land is especially vulnerable to pressures from development of both generation and transmission facilities, which necessitate large tracts of contiguous, undeveloped acreage. As possible impacts are reviewed, Farm Bureau recommends for use in the analysis the information and statistics available from the Department of Conservation. The Department's Farmland Mapping and Monitoring Program produces maps and statistical data used for analyzing impacts on California's agricultural resources. It rates agricultural land according to soil quality and irrigation status, which is useful in assessing the impacts to resources from the range of projects being considered.

NANCY N. McDONOUGH, GENERAL COUNSEL

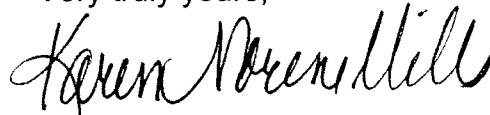
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The draft analysis also refers to the assessments developed through the RETI process, including assessments about locations suitable for support of renewable projects. It is important to recognize that the limitations on development of agricultural land on Williamson Act contract land are incorporated into the assessments developed by RETI for purposes of renewable generation development and transmission development. Of course, it is only one element of the impacts on agricultural resources, but is an appropriate recognition of local and statewide interest in preserving California's agricultural lands. Productive farmland in California is an ever-diminishing resource, incapable of recapture after development. As the draft analysis recognizes, land-use impacts arise from both generation and transmission facilities. While renewable generation facilities are most often developed through voluntary agreement between the landowner and developer, more often than not transmission facilities are sited through the exercise of eminent domain. As a result of involuntary development on agricultural landowner's property the facilities may result in significant consequences to the continued viability of land in agricultural production.

We hope the foregoing will be considered as development of the analysis continues to be undertaken and are available to answer questions that may arise in consideration of the points raised above.

Very truly yours,



KAREN NORENE MILLS